

RAMIRO MORALES, Bar #7101
E-mail: rmorales@mfrlegal.com
MORALES FIERRO & REEVES
600 South Tonopah Drive, Suite 300
Las Vegas, NV 89106
Telephone: (702) 699-7822
Facsimile: (702) 699-9455

Attorneys for Plaintiff,
THE MASSACHUSETTS BAY INSURANCE COMPANY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THE MASSACHUSETTS BAY
INSURANCE COMPANY,

Plaintiff,

vs.

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH PA,

Defendant.

CASE NO.: 2:19-cv-00307-JCM-DJA

**STIPULATION OF VOLUNTARY
DISMISSAL WITH PREJUDICE
PURSUANT TO FED. R. CIV. P.
41(a)(1)(A)(ii)**

IT IS HEREBY STIPULATED AND AGREED by and between the parties and their
respective counsel that the Complaint for Declaratory Relief and Damages filed by Plaintiff The
Massachusetts Bay Insurance Company (ECF # 1) is dismissed with prejudice in its entirety;

IT IS HEREBY FURTHER STIPULATED AND AGREED that each party will bear its
own costs and attorneys' fees in this action.

DATED: July 22, 2021

MORALES, FIERRO & REEVES

BY: /s/RAMIRO MORALES
RAMIRO MORALES
Attorneys for Plaintiff, THE MASSACHUSETTS
BAY INSURANCE COMPANY

1
2 DATED: July 22, 2021

NICOLAIDES FINK THORPE MICHAELIDES
SULLIVAN LLP

3
4 BY: /s/ JEFFREY N. LABOVITCH
JEFFREY N. LABOVITCH
Attorneys for Defendant, National Union Fire
Insurance Company of Pittsburgh, Pa.

5
6
7
8 IT IS SO ORDERED.

9
10 Date: July 28, 2021


11 JAMES C. MAHAN
12 UNITED STATES DISTRICT JUDGE
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I, the undersigned, am employed by the Law Offices of Morales, Fierro & Reeves located at 2151 Salvio Street, Suite 280, Concord, CA 94520. I am over the age of eighteen years and not a party to the within action.

On the below date, I served the document(s) described as:

**STIPULATION OF VOLUNTARY DISMISSAL WITH PREJUDICE
PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(ii)**

x	BY ELECTRONIC FILING AND SERVICE with the Clerk of the Court using the CM/ECF System: in accordance with F.R.C.P 5(b)(2)(D) and the above Court's Local Rules, I electronically filed the foregoing with the Clerk of the Court for the United States District Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.
---	---

on the interested party(ies) in this action as follows:

Jeffrey N. Labovitch, Esq.
NICOLAIDES FINK THORPE
MICHAELIDES SULLIVAN LLP
4365 Executive Drive, Suite 950
San Diego, CA 92121
Email: jlabovitch@nicolaidesllp.com

Attorneys for Defendant NATIONAL UNION
FIRE INSURANCE COMPANY OF PITTSBURGH PA

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 26, 2021, at Concord, California.

/s/ Sheila Bird
Sheila Bird